

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

AT&T MOBILITY SERVICES LLC,

Plaintiff,

-against-

GREGORY INZERILLO,

Defendant.

Case No. 4:17-cv-00841

**MOTION TO COMPEL ARBITRATION AND
MOTION FOR PRELIMINARY INJUNCTION**

COMES NOW AT&T Mobility Services LLC (“Mobility Services”), by and through its attorneys of record hereby move the Court pursuant to the Federal Arbitration Act, 9 U.S.C. §4, for an order compelling binding arbitration of Defendant, Gregory Inzerillo (“Defendant’s”) state court claims in *Inzerillo v. AT&T Mobility Services, LLC*, et al., Case No. 1716-CV13373 (“the State Court Action”), pending in the Circuit Court of Jackson County, Missouri at Kansas City and for a preliminary injunction enjoining those state court proceedings. Inzerillo is the plaintiff in the State Court Action, wherein he seeks damages for lost wages, lost benefits, compensatory damages, punitive damages, pre-judgment interest, and attorneys’ fees, which would exceed \$75,000 in the event of a judgment for Defendant Inzerillo.

WHEREFORE, Mobility Services respectfully requests that this Court enter an Order compelling binding arbitration of all claims identified in Inzerillo’s State Court Action Petition and an Order for preliminary injunction enjoining those State Court Proceedings. Suggestions in support of these motions are filed separately.

[SIGNATURE PAGE TO FOLLOW]

Dated: October 6, 2017

Respectfully submitted,

/s/Jason N.W. Plowman
Kenneth W. Gage* (NY Attorney No. 2477784)
Alison M. Lewandoski * (NY Attorney No.
5541867)
PAUL HASTINGS LLP
200 Park Avenue
New York, New York 10166
212-318-6000 (telephone)
212-319-4090 (facsimile)
kennethgage@paulhastings.com
alisonlewandowski@paulhastings.com

* *pro hac vice* admission pending

Daniel B. Boatright (MO Attorney No. 38803)
Jason N.W. Plowman (MO Attorney No. 67495)
LITTLER MENDELSON, P.C.
1201 Walnut, Suite 1450
Kansas City, Missouri 64106
816-627-4400 (telephone)
816-627-4444 (facsimile)
dboatright@littler.com
jplowman@littler.com

ATTORNEYS FOR PLAINTIFF